

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ANTHONY MANGANELLO,

Plaintiff, **DECLARATION OF MARK  
D. ZUCKERMAN**

-against-

07 Civ. 3644 (HB)

THE CITY OF NEW YORK, et al.,

Defendants.

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**MARK D. ZUCKERMAN**, an attorney duly admitted to practice in the State of New York and the Southern District of New York, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am Senior Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants. As such, I am familiar with the facts stated below and submit this declaration to place the relevant information and documents on the record in support of defendants' omnibus motion in limine.

2. Annexed hereto as Exhibit A is a supplemental decision and order of Acting Justice Patricia Anne Williams in People v. Manganiello of August 6, 2001.

3. Annexed hereto as Exhibit B are excerpts from the transcript of proceedings from People v. Manganiello regarding Manganiello's motion for a directed verdict.

4. Annexed hereto as Exhibit C is a declaration of Sal Miro of February 29, 2008.

5. Annexed hereto as Exhibit D the curriculum vitae of plaintiff's expert Steve Colangelo

6. Annexed hereto as Exhibit E is a letter of Hillary Frommer, Esq. to plaintiff's counsel of March 18, 2008.

7. Annexed hereto as Exhibit F is the 1 page "report" of plaintiff's expert Steve Colangelo.

8. Annexed hereto as Exhibit G is the report of plaintiff's economic expert Dr. Frank Tinari.

Dated: New York, New York  
June 5, 2008

  
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Mark D. Zuckerman